

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MBP-3 P 3 36

UNITED STATES OF AMERICA,)
v.)
ROMAN VALDMA,)
Defendant.)

Criminal No. 03-882-MBB

ASSENTED TO MOTION TO MODIFY CONDITION OF RELEASE

The Defendant, Roman Valdma (“Valdma”), moves for modification of a condition of release requiring Valdma to stay away from his wife, Jane Lanik (“Lanik”). As grounds therefor, Valdma states the following:

1. On August 8, 2003, the Court issued an Order Setting Conditions of Release (the “Order”) in the above-captioned matter.
2. The Order included a condition that Valdma have no contact with all co-defendants and witnesses, including Lanik. Valdma has been legally married to Lanik since November 10, 2000.
3. When the Order was issued, the government questioned the validity of Valdma’s marriage to Lanik. Valdma has since provided the government with documentation that Valdma and Lanik were legally married on November 10, 2000.
4. The government no longer takes the position that Valdma should not contact Lanik. Therefore, counsel for the government, Ms. Schulman, assents to the allowance of this motion.

WHEREFORE, Valdma requests the Court allow his motion.

ROMAN VALDMA
By his attorneys



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Dated: September 3 , 2003

CERTIFICATE OF SERVICE

I hereby certify that the above-referenced document was served upon Emily R. Schulman, Assistant United States Attorney, United States Attorney's Office, One Courthouse Way, Boston, Massachusetts, 02210, by first-class mail, postage prepaid, on this date.



Matthew D. Thompson